

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 12-cr-20545  
Honorable Bernard A. Friedman

MARTIN GRENIER, D-2

Defendant.

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**REQUESTS AND NOTICES  
IN COMPLIANCE WITH STANDING  
ORDER FOR DISCOVERY AND INSPECTION**

In compliance with the Standing Order for Discovery and Inspection entered in this case, Defendant MARTIN GRENIER, through his attorney, WILLIAM W. SWOR, hereby provides the Government with the following requests and notices:

1. It is hereby requested that the Government provide copies or an opportunity to make copies of:
  - a) Any information within the meaning of the “Standing Order”, paragraph 1(a) or Rule 16(a)(1) of the Federal Rules of Criminal Procedure.
  - b) A written summary of the expert testimony the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Criminal Evidence during its case in chief at trial. This summary must describe the witnesses’ opinions, the basis and the reasons therefore, and the witnesses’ qualifications. Rule 16(a)(1)(G).
  - c) Any exculpatory evidence within the meaning of the “Standing Order”, paragraph 1(b) and/or *Brady v Maryland*, 373 U.S. (1963) and *United States v Agurs*, 427 U.S. 97 (1976).

- d) Any document which will be used to refresh the memory of a witness within the meaning of the “Standing Order”, paragraph 8 and/or Rule 612 of the Federal Rules of Evidence.
  - e) Any statement by persons who have possible knowledge or information relative to this case which are not protected from disclosure by 18 U.S.C. §3500.
  - f) Any statement of witnesses within the meaning of 18 U.S.C. §3500(e).
  - g) All communications with foreign (e.g. Canadian) law enforcement and government officials regarding Mr. Grenier, including, but not limited to, banking inquiries, email subpoenas, etc.
2. Notice is hereby given pursuant to the “Standing Order”, paragraph 5(b), that the foundation for any and all exhibits will be contested.
  3. Notice is hereby given pursuant to the “Standing Order”, paragraph 6, that the chain of custody of any and all exhibits will be contested.
  4. Notice is hereby given pursuant to the “Standing Order” , paragraph 7, that any scientific analysis or summary testimony by experts will be contested unless there has been a proper basis for the witness’ testimony under Rule 1006 of the Federal Rules of Evidence.
  5. All requests for information, materials or evidence contained hereby are continuing and the prosecution is expected to immediately provide any additional information, materials or evidence as required by the “Standing Order”, paragraph 3, and/or Rule 16 (c) of the Federal Rules of Criminal Procedure.

6. Notices contained herein will remain in effect unless expressly withdrawn.

Respectfully submitted,

*s/William W. Swor*

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DATED: April 23, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2013, I electronically filed the foregoing pleading with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record.

*/s/ William W. Swor*

WILLIAM W. SWOR